



**DEPARTMENT OF THE NAVY**  
NAVAL FACILITIES ENGINEERING COMMAND, MID-ATLANTIC  
9742 MARYLAND AVENUE  
NORFOLK, VA 23511-3095

N62661 AR 002138  
NAVSTA NEWPORT RI  
5090 3a

5090 IN REPLY REFER TO  
15/OPNEEV4/6062

MAY 1 2007

Kymberlee Keckler  
EPA New England, Region I  
1 Congress Street  
Suite 1100 (HBT)  
Boston MA 02114-2023

Paul Kulpa  
State of Rhode Island  
Department of Environmental Management  
Office of Waste Management  
Providence RI 02908-5767

**3649**

Dear Ms. Keckler & Mr. Kulpa

SUBJECT: RESPONSE TO COMMENTS, DRAFT FACT SHEET UPDATE, SOIL  
REMOVAL ACTIONS, OLD FIRE FIGHTING TRAINING AREA OLD  
FIRE FIGHTING TRAINING AREA, NAVAL STATION, NEWPORT RI

Enclosed you will find responses to your comments and a revised draft fact sheet update for removal actions at the Old Fire Fighting Training Area (OFFTA) at Naval Station Newport, in Newport Rhode Island. Your comments were dated 2/26/07 and 3/12/07, respectively.

The fact sheet update corresponds to the second action memo prepared for this site which underwent your review in December 2006 and was signed January 15, 2007. It is intended to update the public on the Navy's progress removing soil and underground structures, and the design/installation of a shoreline revetment.

Copies of this material have been provided to those on the distribution list below for their records. If there are no further issues, the fact sheet will be published for distribution at the next RAB meeting.

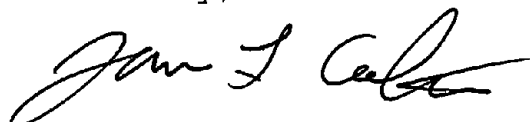
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15/OPNEEV4/6062

MAY 1 2007

If you have any additional questions regarding the enclosed documents, you can contact me by phone at (757) 444-4217 or by email at james.colter@navy.mil.

Sincerely,



JAMES L. COLTER, P.E.  
Remedial Project Manager  
By direction of the  
Commanding Officer

Enclosures

Copy to: (w/encls.)

NOAA, Ken Finkelstein

Gannett Fleming, Jennifer Stump

NAVSTA Newport, Cornelia Mueller

NAVSTA Newport RAB, c/o Cornelia Mueller (10 copies-Fact Sheet)

TtNUS, Steve Parker

Site File/Information Repository

**ATTACHMENT A  
RESPONSES TO COMMENTS FROM USEPA  
DRAFT FACT SHEET UPDATE  
SOIL REMOVAL ACTIONS  
OLD FIREFIGHTING TRAINING AREA  
COMMENTS DATED 2/26/07**

<u>Page</u>	<u>Comment</u>
p. 2, ¶1	<i>The first sentence should be revised to improve clarity. Change "contains" to "contain." The soil and fill contain remnant contaminants.</i>
Response:	Concur, this revision will be made.
p. 2, ¶2	<i>The volume of material previously proposed for removal (58,000 cy) is specified in this paragraph but the current proposed estimated volume (3,500 cy) under the scaled back soil removal is not specified. The fact sheet should better explain the rationale for the magnitude of the change and present both volumes.</i>
Response:	Concur, this revision will be made.
p. 2	<i>Text in the "Why Does the Navy Recommend this Plan?" related to risk is the same as it was in the 2003 fact sheet. The proposed action in 2003 was to remove 58,000 cy while the current proposed plan removes 3,500 cy. The phrase, "thereby ensuring long-term protection of human health and the environment" should be deleted.</i>
Response:	The comment is noted. Although the amount of soil to be removed is significantly reduced, the protection of the receptors is still the goal. The Navy proposes to revise this statement to say, "thereby contributing to long-term protection..."
p. 4	<i>The site history identifies "A design study was completed that mapped out the areas of soil exceeding concentrations deemed 'hazardous.'" The Work Plan for the Soil Pre-Design Investigation (PDI) for OFFTA was completed in 2003 but the PDI was completed in 2004. The description in the site history of the design study does not match with the soil PDI objectives. Is the 'design study' the soil PDI? The use of the word "hazardous" in the site history text for the design study is problematic because the current removal is only for soil that is deemed "hazardous" but the definition of "hazardous" used in the design study is likely not the same.</i>
Response:	The design study is the soil PDI, inclusive of the mound removal evaluation report and the addenda for the follow-up borings. The term hazardous is not used in the Soil PDI, it was not identified as such until the conceptual site model was revised. The Fact Sheet Update will be revised per language provided in K. Keckler's electronic mail 3/19/07.
p. 4	<i>The date of the signed Action Memorandum for the second phase should be revised.</i>
Response:	Concur, this revision will be made.
p. 5	<i>The text under the clean up objectives regarding shellfish collection needs to be revised. The text states, "...Current state restrictions preventing shellfish collection...." It was mentioned during the November 2006 RPM meeting that limited shellfish collection is allowed at the site for certain populations. The word "preventing" needs to be changed. The text should clarify the state restrictions. It is unclear whether these restrictions (and their enforcement) are effective at minimizing shellfish collection.</i>

Response: Collections for Lobster are allowed in some Navy waters, this will be clarified.

p. 5 *There are two bullets specifying objectives. The introductory sentence mentions three initial cleanup objectives. The introduction should be changed to identify two objectives.*

Response: Concur, this revision will be made.

**ATTACHMENT B  
RESPONSES TO COMMENTS FROM RIDEM  
DRAFT FACT SHEET UPDATE  
SOIL REMOVAL ACTIONS  
OLD FIREFIGHTING TRAINING AREA  
COMMENTS DATED 3/12/07**

**1.      *Excavate contaminated soil and debris.*  
          Page 2.**

*This section of the fact sheet notes that originally 58,000 tons of soil was to be removed from the site. The fact sheet does not include a figure for the estimated tonnage of soil that will be removed under the current proposal. As this is a public document, please include a statement in this paragraph with the estimated tonnage of soil that will be removed under the current proposal*

Response:      Concur, this will be added to the fact sheet update.

**2.      *Why does the Navy Recommend this Plan*  
          Page 2.**

*There have been disagreements between the Navy and the regulators concerning the scale of the remedial action for the site and the associated risk. Therefore please remove the following from this box*

*"Meets risk reduction goals."*

*"thereby insuring long term protection of human health and the environment"*

Response:      The comment is noted. Although the amount of soil to be removed is significantly reduced, the protection of the receptors is still the goal. The first bullet will be deleted as suggested. However, the Navy proposes to revise the second bullet to say, "thereby contributing to long-term protection..."

**3.      *Site History*  
          Page 3.**

*Please add the following:*

*1989.....construction excavation at the Old Fire Fighter Training Area*

*Please note when the site was used as a day care facility, when the facility was closed, and when a new playground was proposed.*

*2001 There has been disagreements between the Navy and the State concerning shellfish ingestion rates, therefore please remove the statement 47 meals per year.*

Response:      The first item above will be added. There is no information in the record of the second item above. Regarding the shellfish ingestion rates, the figure stated is that which was used to calculate risk, and therefore, it should remain.

**4.      *What are the Cleanup Objectives*  
          Page 5.**

*As the fact sheet is designed for the public the Navy must include the proposed cleanup criteria for residential standards and the proposed restricted use. Therefore please modify the above as follows:*

*...or recreational purposes. The Navy initially proposed cleaning up the site to unrestricted recreational standards. As such the cleanup criteria for TPH would have been 500 ppm and the criteria for other contaminants, such as lead would have been 150 ppm.*

*...is restricted recreation and Navy personal use. The cleanup criteria under this scenario would be 30,000 ppm for TPH and there are no cleanup criteria for the other contaminants at the site.*

Response:      The Navy concurs with the intent of the comment and will cite changes to cleanup criteria as noted. The exact language above will be modified to fit the context of the presentation.



# FACT SHEET UPDATE

## SOIL CLEANUP AT THE OLD FIRE FIGHTING TRAINING AREA

### Update for April 2007

#### NAVAL STATION NEWPORT Installation Restoration Program Newport, Rhode Island

##### *The Cleanup Proposal...*

*After careful study of the Old Fire Fighting Training Area, the Navy continues the removal of contaminated soil and fill from the property.*

*The Navy will:*

- **Excavate** contaminated soil and debris.
- **Dispose** of contaminated soil and rubble in an approved off-site facility.
- **Restore** the excavated areas for continued Navy use of the property.
- **Construct** a protective stone revetment and a fence to restrict access to the shoreline in this area.
- **Allow** future use with specific controls.

##### Find Out More...

The Navy invites you to attend the RAB meetings on the third Wednesday of selected months to learn more about the continuing cleanup. The Navy will respond to your questions and concerns about the proposed cleanup and how it may affect you. For further information on the RAB meeting, contact Cornelia Mueller at [cornelia.mueller@navy.mil](mailto:cornelia.mueller@navy.mil)

**All Are Welcome at the  
Restoration Advisory  
Board (RAB) Meeting  
Third Wednesday of  
Selected Months**

**7:00-9:00 PM**

**Officer's Club  
Naval Station Newport  
Newport, Rhode Island**

**For a complete calendar visit:  
<http://www.rabnewportri.org>**

##### What's new?

A Public Meeting was held in July 2003, where the Navy proposed a removal action for the site. Since that time, the Navy has completed several parts of that action:

- A pre-design investigation was conducted to refine the area where removal should be conducted.
- The removal of debris mounds was completed in 2005.
- During removal of the debris mounds, remnant structures were found underneath that also require removal.
- An independent panel of scientists and engineers reviewed the studies conducted for this site and recommended two additional risk evaluations prior to determining a permanent remedy for the site.
- Plans for the second phase of the removal action have been drafted and are available at the public libraries for comment.

*In accordance with the law that established the Superfund program (the Comprehensive Environmental Response, Compensation and Liability Act - CERCLA), this document summarizes changes to the Navy's cleanup proposal. For detailed information on the options evaluated for use at the site, see the Old Fire Fighting Training Area Feasibility Study (September 2002) and other documents available for review at the information repositories at the Portsmouth, Middletown, and Newport Public Libraries.*



## ***A Closer Look at the Navy's Proposal...***

### **Excavate contaminated soil and debris.**

Soil and fill at the site contain remnant contaminants from use of fuel and from fire training operations. Polycyclic aromatic hydrocarbons (PAHs), common in oil and produced by burning, exist in the soil along with residual oil and fill consisting of brick, concrete and rubble. Some metals that exceed state criteria for residential property are also present in soils.

Approximately 58,000 cubic yards of material (about 5 acres) were planned to be excavated. After the area was better defined in 2004, and after the first phase of the removal was conducted, the planned amount was reduced to 3,500 cubic yards.

The basic steps for this action are described below:

- Excavate the contaminated soil using conventional earth-moving equipment.
- Demolish and remove building foundations and other structures from fire training operations that may harbor residual contamination.
- Transport the contaminated soil/debris off-site in trucks.
- Dispose of this material at an approved off-site facility.
- Backfill the excavated areas with clean soil.
- Stabilize the shoreline and protect it from erosion with a replacement stone revetment.

### **What impacts would the removal have on the local community and the environment?**

The construction effort has been separated into several phases. The first phase was conducted in 2004 and 2005. The second phase is planned for late 2007, and residents may notice:

- noise from construction activities, and
- an increase in truck traffic on the access road to Gate 1 and on local primary routes leading east or north.

### **Why Does the Navy Recommend this Plan?**

The Navy recommended a removal action that uses excavation to address contaminated soil at the site. This approach:

- Addresses the highest risk by removing contaminated soil from the environment and disposing of it properly, thereby contributing to the long-term protection of human health and the environment.
- Allows temporary restricted re-use of the property.
- Contributes to the final remedy, still to be decided.

### **Why is Removal Needed?**

Some levels of contaminants were found in excess of what is considered "hazardous" levels and must be removed.

Some structures and piping were left in the ground when the fire training area was demolished. To assure these structures do not continue to provide contaminants to the environment, they will be removed.

The existing erosion protection at the site has been shifted and damaged by storm events since the 1970s. This system will be replaced with a revetment that is to be designed to protect the shore from erosion, and protect the harbor and ecosystem.

A risk assessment conducted in 2001 found there is possible risk for health effects under certain conditions. This study concluded that the most significant potential for risk was from exposure to subsurface soils if the site was to be used for residential property. Therefore the property use is restricted until a final remedy is selected for the site.

The Navy is temporarily restricting use on the property until a final remedy can be determined by the US Environmental Protection Agency, The Rhode Island Department of Environmental Management and the Navy.



## *Site History*

The Old Fire Fighting Training Area, used as a fire training school by the Navy from the 1940s to the early 1970's, is located on 5.5 acres along the north end of Coasters Harbor Island.

**1940s:** The site opened as a Navy fire fighting training area. Fire training exercises were conducted, which involved using water to extinguish burning oil in a series of pits and small buildings, meant to simulate ship compartments. This water carried oil into the soils of the training area and to the shoreline of Coasters Harbor Island.

**1972 to 1974:** The fire training facility was closed. Most of the structures at the site were demolished, debris and some soils were pushed into three mounds at the site, and the whole site was covered with topsoil and seeded.

**1976:** The site was dedicated and reopened as Katy Field (ball field and picnic area).

**1983:** The Initial Assessment Study was completed for the Newport Navy Base to identify, assess, and control contaminants from past hazardous materials management. Based on the information available, the site was not initially identified as a site requiring further action.

**1989:** NAVSTA Newport sites were added to EPA's National Priorities List. Oil-contaminated soils were found in a construction excavation at the Old Fire fighting Training Area.

**1991:** The Phase 1 Remedial Investigation was completed. This study found that contamination was present and recommended further investigation.

**1992:** A Federal Facilities Agreement, signed by the Navy, EPA, and RIDEM, identified responsibilities for cleanup activities and a schedule by which to implement them.

**1992:** Phase 2 Remedial Investigation for the site was completed. The study further delineates extent of contamination.

**1996:** A citizen's advisory committee called a Restoration Advisory Board (RAB) was established to assist the Navy in addressing the Installation Restoration program sites.

**1997 and 1998:** Studies determined that oil-related contaminants are present in subsurface soil between two and ten feet below ground surface. The Site was closed to recreational activities and fenced to restrict access during remaining investigations and cleanup.

**1998-2000:** Risk assessments were conducted to determine risks to the off-shore environment from contaminants in the site soil and adjacent offshore sediment. Studies concluded that contaminants are present at concentrations that pose some increased risk to marine animals. The highest area of risk was found near one of the storm drain outfalls.

**2001:** The Remedial Investigation was completed documenting that there would be increased risks to persons using the area for residential property and to persons habitually ingesting shellfish (47 meals per year) collected from adjacent Coasters Harbor.



### ***Site History (continued)***

**2002:** A Feasibility Study was developed to evaluate remedial action alternatives for the soils, groundwater and the marine sediments of Coasters Harbor.

**2003 – 2004:** A design study was completed that provided additional evaluation of nature and extent of contamination. One area was found that contained soils with petroleum at concentrations exceeding Rhode Island upper concentration limits.

**2004-2005:** The first phase of the removal action was conducted: the Navy removed soil and debris mounds containing concrete and metal left after demolition of the training area structures in 1974.

**2006:** Conceptual designs were prepared for removal of the subsurface soil and installation of the replacement stone revetment. An independent panel of scientists and engineers reviewed this design and the expected risk reduction, and recommended a revised approach for this removal action:

- Remove only the soil that exceeds "upper concentration limits" regulated by the State of Rhode Island,
- remove remaining structures from the fire training area that are still underground and may pose a continued threat of contamination,
- expand the risk evaluations already conducted to calculate risk to workers at the site, and
- revise the Feasibility Study to evaluate a permanent land use restriction to retain the property as open space.

### **What are the Next Steps?**

On January 15, 2006, the Navy signed a second "Action Memorandum" directing the second phase of the chosen removal action dated January 15, 2006. The Action Memorandum and work plans for this phase of removal will be available at the information repositories at the Portsmouth, Middletown, and Newport public libraries.

These plans will be reviewed by the U.S. Environmental Protection Agency and the Rhode Island Department of Environmental Management and implemented after agreement on how the work will be carried out.

After this second phase of the removal action, the risk from exposure to groundwater and sediments will be reviewed. Based on that review, a final remedy for the site will be selected.

### **Is this the Final Action?**

This is the second phase of an interim removal action begun in 2004. This action will address the worst part of the contamination present, and will contribute to the final remedy at the site as required by Section 104(a)(2) of CERCLA.

A final remedy for the entire site will be proposed to the public, as required by Superfund, before being selected. That final remedy will be proposed to the public through the RAB, as well as public meetings, hearings, and other outreach efforts.



## What are the Cleanup Objectives?

Investigations concluded that there are contaminants in the soil at the site that pose unacceptable risk to persons using the site for uncontrolled residential and or recreational purposes. However, the future use of the site is currently planned for restricted recreation and Navy personnel use.

The Navy identified two initial cleanup objectives to address the identified risks:

- Prevent people from contacting soil containing contaminants that exceed the acceptable levels for unrestricted use of the site.
- Address the soil in a manner that will prevent degradation of groundwater at the site, and that will result in a decrease in groundwater contamination.

For this removal action, soil with petroleum concentrations exceeding Rhode Island upper concentration limits will be removed from the site.

Current state restrictions prevent some shellfish collection (clams, oysters, etc.) and Navy restrictions on use of the shoreline are the current measures in effect until a permanent solution can be reached to address contaminants in sediment. However, crab and lobster collections are allowed in these areas.

Additionally, groundwater shall not be used for water supply until a permanent solution can be reached to address contaminants in groundwater.

## Stay Informed

The Newport Naval Station RAB is a volunteer group of local citizens who meet regularly to hear and advise the Navy as they:

- identify and evaluate contaminated Navy facilities,
- comply with procedural and substantive requirements of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) as amended by the Superfund Amendments and Reauthorization Act (SARA), and
- conduct proactive public outreach programs and community relations.

The RAB meets at the Newport Naval Officers' Club at 7:00 PM on the 3<sup>rd</sup> Wednesday of selected months. Check our calendar for dates and for occasional changes to time or place.

For more information on the RAB, visit:  
<http://www.rabnewportri.org>

## Different Kinds of Cleanup

The Navy looked at numerous technical approaches to determine the best way to reduce the risks presented by a site. The possibilities are then narrowed to approaches that would protect human health and the environment. Although reducing risks often involves combinations of highly technical processes, there are limited basic options for the soil.

### 1. Take no action:

Leave the site as it is.

### 2. Isolate the contaminants:

Provide a barrier between contaminants and receptors (people and wildlife). Barriers can be as simple as fences (to keep people away) or as complex as multi-layer cover systems with a legal land-use restriction.

### 3. Remove contaminants:

Remove contaminated soil and fill, and dispose of it or treat it elsewhere.

### 4. Treat contamination on site:

Use a chemical or physical process on the site to destroy or remove the contaminants. Treated material can be left on site. Contaminants captured by the treatment process are disposed of at an approved disposal facility.

### 5. Monitor the contaminants:

Many remedies are combined with monitoring after completing the remedial action to assure that the action achieved the cleanup objectives. If contaminant levels increase again after the action, it is likely that another solution will need to be identified.

### 6. Interim actions:

A series of interim actions may be selected for one part of the site until another part of the site is restored. For instance, an interim action could be the removal of some soil and structures that may be a continuing source of contamination to the site.

***The proposal for this site is to conduct an interim action (#6) and remove the contaminants (#3).***



## For More Detailed Information

This publication summarizes a number of reports and studies to help the public understand and comment on the proposal for the site. The Draft Final Feasibility Study (September 2002) and supporting documents prepared for the site have been provided to the following information repositories for Naval Station Newport:

Middletown Public Library  
West Main Road  
Middletown, RI  
401-846-1573  
Hrs. Mon-Fri: 10 – 8  
Sat: 10 – 5

Newport Public Library  
300 Spring Street  
Newport, RI  
401-847-8720  
Hrs. Mon: 12:30 – 9  
Tue-Thu: 9:30 – 9  
Fri-Sat: 9:30 – 6  
Sun: 1 – 5

Portsmouth Public Library  
2658 East Main Road  
Portsmouth, RI  
401-683-9457  
Hrs. Mon-Thu: 9 – 8  
Fri-Sat: 9 – 5

**Also, keep up to date on the Installation Restoration Program by visiting the RAB Web site:**  
<http://www.rabnewportri.org>

**Additionally, information can be obtained by contacting the Navy, EPA, or RIDEM at:**

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Federal Facilities, Superfund Section  
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Boston, MA 02114-2023  
(617) 918-1385 or (888) 372-7341

Paul Kulpa  
Remedial Project Manager  
Office of Waste Management  
R.I. Department of Environmental Management  
235 Promenade Street  
Providence, RI 02908-5767  
(401) 222-2297 ext. 7111

**The public is invited to attend the regularly scheduled RAB meetings held on the third Wednesday of selected months at 7:00 p.m. For information on RAB meetings, contact Cornelia Mueller, 401-841-7561, or visit:**  
<http://www.rabnewportri.org>



## Use This Space to Write Your Comments Or to be added to the mailing list

The Navy wants your written comments on the options under consideration for reducing risk at Coasters Harbor Island from soil that has been contaminated by chemicals from the Old Fire Fighting Training Area. You can use the form below to send or fax written comments. If you have questions about how to comment, please call Cornelia Mueller at 401-841-7561. This form is provided for your convenience. Please mail this form or additional sheets of written comments to:

Cornelia Mueller  
Naval Station Newport  
Environmental Department  
1 Simonpietri Drive  
Newport, RI 02841  
Fax: (401) 841-7561

Or E-mail to:

Cornelia Mueller at [cornelia.mueller@navy.mil](mailto:cornelia.mueller@navy.mil)

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(Use reverse side and attach sheets as needed)

Comments Submitted by:

### MAILING LIST ADDITIONS, DELETIONS OR CHANGES

If you did not receive this through the mail and would like to

be added to the site mailing list

note a change of address

be deleted from the mailing list

Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Please check the appropriate box and fill in the correct address information above.

**Public Comment Sheet (cont....)**

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Place  
Stamp  
Here

**Cornelia Mueller  
Naval Station Newport  
Environmental Department  
1 Simonpietri Drive  
Newport, RI 02841**